

REMARKS

Claims 1-3 remain pending. Claims 1 and 2 are currently amended. No claims are canceled or added.

Claims 1 and 2 stand objected to because of their form. Based on the Office Action, page 2, the objection seems to be based on an understanding that the “connector” recited in line 10 of each claim is the same connector that is previously recited in line 7 of the claim.

In contrast, there are two connectors, and claims 1 and 2 are amended now to emphasize this feature. Accordingly, withdrawal of the objection is now requested.

Claims 1-3 stand rejected under 35 U.S.C. § 103(a) as obvious over *Singer* (U.S. Patent No. 5,269,698) in view of *Iwano et al.* (U.S. Patent No. 4,895,425). Applicants respectfully traverse this rejection as improper for at least three reasons.

First, claims 1 and 2 describe a galley that has a “galley body,” and claim 3 implicitly describes this subject matter by virtue of its alternative dependency from claims 1 and 2. A “galley” is a term used to describe an area for food preparation. Enclosed are the results from an OneLook® dictionary on-line search for definitions of the term “galley.” The “quick definitions” on the right side of the first page confirm that the “galley” can be used to denote the kitchen area for food preparation on a ship or in an airliner. Thus, a “galley body” is an element of such kitchen area.¹

The rejection relies on element 10 of *Singer* to teach the “galley body” recited in the claims. However, element 10 is not an area for food preparation. In contrast, element 10 is an

¹ According to the Office Action, page 2, the recitation “for preparing food and drink in an aircraft” is disregarded, perhaps because the phrase is recited in the claims’ preambles. However, the recitation “galley body” is recited in the *body* of the claim, so the recitation “galley body” should receive patentable consideration. (Applicants are not relying on just an intended use of preparing food or drink in an aircraft.)

assembly that includes a disk drive. That is, the assembly is part of a computer. (Abstract.) Thus, the rejection essentially relies on a computer to teach a “galley body.”

Applicants realize that claims elements are interpreted broadly during prosecution; however, they may only be interpreted as broad as *reasonable*. (MPEP § 2111.) Applicants are unaware of any reasonable definition of “galley body” that would cover a computer. Unless the PTO can provide such definition, the rejection should be withdrawn for at least the reason that a prior art teaching of a computer cannot anticipate a “gallery body” as claimed.

Even if it were proper to interpret a prior art disclosure of a computer as teaching a “galley body” as claimed, the rejection is improper for a second reason:

The claims specify that the galley has a “storage unit” and an “electric device.” Claim 1 further specifies that the storage unit has a “pair of guide holders” and that the electric device has a “pair of guide pins.” Claim 2 specifies that the storage unit has a “pair of guide pins” and that the electric device has a “pair of guide holders.” The claims also specify that the guide pins and guide holders have a “photocoupler” disposed thereto.

The rejection relies on the *Singer* disclosure of alignment hole 24a to teach the pair of guide holders and on guide pins 88a and 88b to teach the pair of guide pins recited in the claims.² It is acknowledged that *Singer* does not disclose the photocoupler as claimed. Thus, the rejection relies on *Iwano et al.* to suggest modifying the *Singer* computer and disk drive assembly so that the alignment holes and the guide pins would have a photocoupler disposed thereto. *Iwano et al.* discloses guide pins 33 mating with guide holes 22, which therefore aligns plugs 4 with jacks 5 to achieve an optical connection. (See, for example, Figs. 3(A) and 3(B).) As motivation for his

² Unlike claim 1, claim 2 specifies that the electric device, supposedly anticipated by disk drive assembly 12, has guide holders instead of the guide pins. *Singer* discloses disk drive assembly 12 having guide pins instead of alignment holes, so it does not provide the anticipating subject matter relied upon for the rejection of claim 2.

modification, the Office Action indicates that the modification would provide “better connection.”

Applicants respectfully assert that such a statement does not properly justify why it supposedly would have been obvious to combine separate teachings from *Singer* and *Iwano et al.* If the modification really would have achieved a “better connection,” to justify the rejection, it must be explained why someone would have thought of this modification beforehand instead of merely appreciating, after learning of the modification, that there would have been a benefit of better connection. The Office Action provides no such explanation, such as by citing a supporting prior art disclosure, which indicates why anyone would have thought of achieving the better connection by the described modification.

The Office Action also provides no explanation of what is “better” about the connection. The *Singer* guide pins presumably mate adequately with the alignment holes,³ and the Office Action does not explain why adding an optical connection as in *Iwano et al.* would make the mating any better. The *Singer* connection is between a computer and a disk drive assembly, and no reason is provided in the Office Action why one skilled in the art would want to add an optical connection *for a disk drive*. Thus, the Office Action does not adequately explain why it would have been obvious to modify the *Singer* assembly in view of *Iwano et al.* Thus the rejection is unjustified for a second reason, also.

Even if it were obvious to modify the *Singer* assembly in view of *Iwano et al.* as discussed in the Office Action, and even if it were proper to interpret the *Singer* disclosure of a computer as teaching a “galley body,” the rejection is also improper for a third reason:

³ Under 35 U.S.C. § 282, a patent shall be presumed valid. Although this presumption may be rebutted, the Office Action does not indicate any dispute that the *Singer* guide pins mate adequately with the alignment holes.

The claims specify that the guide pins and the guide holders have a photocoupler “disposed thereto.” Therefore, the *Iwano et al.* disclosure of plugs 4 with jacks 5 disposed at a location separate from guide pins 33 and guide holes 22 is not a teaching of guide pins and guide holders having a photocoupler “disposed thereto” as claimed. Thus, *Iwano et al.* cannot provide a suggestion to modify the *Singer* assembly to have every feature recited in the claims, and the rejection is unjustified for at least a third reason.

In view of the multiple reasons provided above, applicants now request withdrawal of the obviousness rejection.

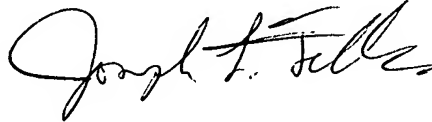
In another matter, applicants note that the Office Action does not include acknowledgement of applicants’ claim to foreign priority under 35 U.S.C. § 119, nor does the Office Action acknowledge that certified copies of the priority documents were submitted. Applicants request that the next communication from the PTO provide such acknowledgement.

In view of the remarks above, applicants now submit that the application is in condition for allowance. Accordingly, a Notice of Allowability is hereby requested. If for any reason it is believed that this application is not now in condition for allowance, the Examiner is welcome to contact applicants’ undersigned attorney at the telephone number indicated below to discuss resolution of the remaining issues.

In view of the remarks above, applicants submit that the entire application is in condition for allowance, and a Notice of Allowability is now requested. If the Examiner believes that issues remain unresolved, he is welcome to contact the undersigned.

If necessary, the undersigned authorizes deducting any fees that may be due from Deposit Account No. 50-2866.

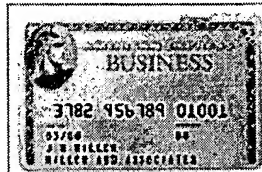
Respectfully submitted,
WESTERMAN, HATTORI, DANIELS & ADRIAN, LLP

A handwritten signature in black ink, appearing to read "Joseph L. Felber". The signature is fluid and cursive, with the first name "Joseph" and last name "Felber" clearly distinguishable.

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Enclosure: OneLook® dictionary search results

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17. [galley](#) : Webster's 1828 Dictionary [[home](#), [info](#)]
18. [galley](#) : All About Homonyms [[home](#), [info](#)]
19. [galley](#) : Columbia Encyclopedia, Six Edition [[home](#), [info](#)]
20. [GALLEY](#) : 1911 edition of the Encyclopedia Britannica [[home](#), [info](#)]
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Quick definitions
 (*Galley*)

- **noun:** the area for food preparation on a ship
- **noun:** the kitchen area for food preparation on an airliner
- **noun:** (classical antiquity) a crescent-shaped seagoing vessel propelled by oars
- **noun:** a large medieval vessel with a single deck propelled by sails and oars with guns at stern and prow; a complement of 1,000 men; used mainly in the Mediterranean for war and trading
- **name:** A surname (very rare: popularity rank in the U.S.: #23034)
- *Word origin info is available.*

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- 31. galley : Discover The Outdoors Glossary [[home](#), [info](#)]

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- 33. GALLEY : Glossary of Nautical Terms [[home](#), [info](#)]



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